

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
WKTV, Community Television Wyoming, Michigan**

WKTV, Community Television submits these comments in response to the above captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

WKTV, Community Television was incorporated in 1974 and has built up to being one of the finest community television and media services in the state. Programming, involvement and media creation covers a wide variety of ethnic groups, non-profit organizations, civic groups; and schools including area universities. A robust university internship program and a body of nearly 500 community volunteers maintain and keep the station on the air through the creation of real community television and other local media content. WKTV is heavily involved in assisting two local municipalities with messaging to the communities at large and provides a wide range of government television services in addition to public television services. WKTV provides comprehensive media training in a wide range of subjects at virtually no cost to encourage expression in community media. Last calendar year, volunteers at WKTV Community Television logged just over 14,000 volunteer hours.

- 1. Comcast and AT&T U-Verse provide three channels for WKTV Community Television.**
- 2. On Comcast, these channels are currently placed on the lowest tier of cable provided. If residents only have analog television sets they require a digital converter box to receive this basic service. On AT&T U-Verse, the channels mentioned are placed on Channel 99 and viewers have to access a menu with their remote, then scroll down to the desired community and then activate viewing of the channel. The process is lengthy compared with the immediate access to other channels.**
- 3. There is one less channel being carried on U-Verse than on Comcast.**
- 4. Unfortunately our provider does not allow for distribution of our programming schedule on the system’s on-screen program guide. Residents must navigate to our web site to view our programming schedule, though we can provide all necessary data required for inclusion on an on-screen program guide.**

- 5 Yes, we are in a AT&T U-Verse community and viewers, especially the elderly who have U-Verse often complain that it is confusing and difficult to view PEG programming on U-Verse Channel 99. As previously stated, the requirement to use your remote to navigate a menu of channels covering 10 counties to find the channel specific to your community is time consuming and discourages viewership as it would to any channel
6. Usage of WKTV in both of the communities continues to be on the steady increase from year to year. In 2007 when the Michigan state wide video franchise went into effect, the PEG operations in Michigan all lost a full quarter of funding due to the new franchise payment schedule that video service providers were allowed to begin in 2007. We are also waiting for the cable and video service providers to carry the PEG signal in HD as so much of the production equipment is now only available in HD. AT&T has provided more robust capital grants, but at the same time requires us to pay for the transmission of our signals to their respective head ends and those transmission costs that they bill us for virtually eat up all of any gains in capital funding. The high amount of community usage within the two communities shows the profound desire of residents to see PEG operations continue and that they continue to be as accessible as any other channel. Thank you for giving us the opportunity to speak out on this matter.

A handwritten signature in black ink, appearing to read "Tom Norton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tom Norton, General Manager, WKTV Community Television 616-261-5700
tom@wktv.org